## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY: AVERAGE WHOLESALE PRICE LITIGATION

MDL NO. 1456

CIVIL ACTION: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO ALL ACTIONS

JUDGE PATTI B. SARIS

## MOTION TO PERMIT KIMBERLY K. HEUER TO APPEAR PRO HAC VICE

Pursuant to Rule 83.5.3(b) of the Local Rules of this Court, Mark D. Smith, a counsel of record for defendants Pfizer Inc. and Pharmacia Corporation, hereby moves this Court to permit Kimberly K. Heuer to appear on its behalf as counsel *pro hac vice* in the above-captioned action.

In support of this motion, undersigned counsel states the following:

- 1. The undersigned is a member in good standing of the bar of this Court.
- 2. Ms. Heuer is a member in good standing of the state bar of Pennsylvania.
- 3. Ms. Heuer is an associate at the law firm of Morgan, Lewis & Bockius LLP.
- 4. There are no disciplinary proceedings pending against Ms. Heuer as a member of any bar in any jurisdiction.
- 5. Ms. Heuer has indicated in her Certificate attached hereto that she is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

In further support of this Motion, Ms. Heuer has submitted herewith her Certificate of Good Standing as required by Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully moves for the admission of Ms. Heuer to practice before this Court *pro hac vice*.

Respectfully submitted, PHARMACIA CORPORATION; PFIZER INC. by its attorney,

Mark D. Smith (BBO# 542676)

Laredo & Smith, LLP 15 Broad Street, Suite 600 Boston, MA 02109

617-367-7984 617-367-6475 (Fax)

Dated:

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## CERTIFICATE OF GOOD STANDING

Kimberly K. Heuer, an associate with the firm Morgan, Lewis & Bockius LLP, 1701 Market Street, Philadelphia, Pennsylvania, 19103-2921, hereby certifies:

- 1. I am a member of the State Bar of Pennsylvania.
- 2. I have been admitted to practice before the United States District Court for the Eastern District of Pennsylvania.
- 3. I am a member of the Bar in good standing in every jurisdiction in which I have been admitted to practice.
- 4. There are no disciplinary proceedings against me as a member of the Bar in any jurisdiction.
- 5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Under penalty of perjury this 6th day of January, 2006.

Respectfully submitted,

Kimberly K. Heuer

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